

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MARANDA TIBBS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action Case No. 3:09-cv-1205
CALVARY UNITED METHODIST	)	Judge Campbell
CHURCH,	)	
	)	
Defendant.	)	
	)	
	)	

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DECLARATION OF JAMES "JIM" MACDONELL

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I, James "Jim" MacDonell, after being duly sworn, according to law, do hereby depose and state as follows:

1. My date of birth is January 20, 1948. I am 62 years old.
2. I am employed by Calvary United Methodist Church as an assistant teacher in the Young Children's School (the "School").
3. I have personal knowledge of the facts as set forth herein unless otherwise indicated.
4. In 1994 the School failed to obtain accreditation from the National Association for the Education of Young Children ("NAEYC"). As a result, a task force was formed with the goal of getting the school NAEYC accredited.
5. In order to obtain NAEYC accreditation the task force set out to implement changes in policies at the School. One of the changes in policy was that the lead teacher in each classroom would be required to have a degree. This change, among others, was met with opposition from some of the teachers employed at the School.

6. Specifically, Hedy Morrison ("Hedy"), was vocal in her opposition to the task force, and changes in policy requiring a degree for a lead teacher position. Hedy did not have a degree. She had been a lead teacher for years under the old policy which did not require one.

7. The school obtained NAEYC accreditation for the first time in the Spring of 1997.

8. Sharon Golden ("Sharon") began as the director of the School in 2007. It is my understanding that the board made decisions with regard to any changes made at the school, and Sharon's job was to implement the changes.

9. When Sharon began as the director, the School again underwent many changes, including classroom teacher assignments. Some of these changes were met with opposition from some of the teachers, including Maranda Tibbs. Maranda Tibbs was vocal about her displeasure with her and Lynn Short being split up.

10. Sharon, however, remained an advocate for the teachers.

11. While Sharon Golden has served as the director of the School I have never heard her say anything derogatory or do anything discriminatory towards any employee of the School, including Maranda Tibbs.

12. We have had a more diverse group of teachers at the School under Sharon's leadership than ever before. She has hired more African American and male teachers than any other director in the time that I have been employed at the School. I have been employed with the School since 1989.

13. As part of my employment at the School I am required to attend regularly scheduled staff meetings.

14. I attended a staff meeting on July 23, 2008 (the "Meeting") in its entirety.

15. I recall Linda Scott being present at the Meeting.

16. At no time during the meeting did I hear Linda Scott use profane language or curse word(s) as it related to her classroom assignment for the upcoming 2008-2009 school year, or any other item.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17<sup>th</sup> day of November 2010.

James L. MacDonell  
James "Jim" MacDonell